



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 27, 2019

BY ECF

The Honorable Colleen McMahon
Chief U.S. District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007

Re: United States v. Michael Carroll et al.,
19 Cr. 545 (CM)

Dear Chief Judge McMahon:

The Government respectfully submits this letter to request that the Court enter the attached protective order. The discovery in this case contains a significant volume of sensitive business and personal information and the proposed order will enable the government to meet its discovery obligations quickly and without the need for extensive redactions. Both defendants have consented to the terms of the proposed order.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
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